CONFORMITY ANALYSIS

Introduction

The Regional Transportation Improvement Program (RTIP) is the federally required short-range document that implements the long-range Regional Transportation Plan (RTP). The biennial RTIP update is produced on an even year cycle. This RTIP cycle is consistent with the State Transportation Improvement Program (STIP) cycle. The 2006 STIP in the Southern California Association of Governments (SCAG) region was incorporated into the 2006 RTIP for conformity analysis. The Federal Highways Administration (FHWA) and Federal Transit Administration (FTA) approved the 2006 RTIP on October 2, 2006.

Project Description

RTIP Amendment 06-06 includes seven non-exempt projects (see project listing). Projects included in the amendment are located within the South Coast Air Basin (SCAB), and the Salton Sea Air Basin (SSAB); therefore this conformity determination is being made for both of these air basins. Amendment 06-06 relies on the regional emissions analysis for the 2004 RTP, as amended, and the 2006 RTIP.

Federal Requirements

Federal and state regulations allow that SCAG, as the designated Metropolitan Planning Organization (MPO), may rely on a previous regional emissions analysis when processing amendments, in the event that certain conditions are met. Section 93.122(g) is the relevant part of the Transportation Conformity rule for this amendment.

Conformity Status of Current RTIP and RTP

On June 7, 2004, the federal conformity determination for the 2004 RTP was issued for the following non-attainment and maintenance areas:

- South Coast Air Basin (SCAB Ozone, CO, NO₂, and PM10)
- San Bernardino County portion of the Mojave Desert Air Basin (MDAB PM10)
- Coachella Valley portion of the Salton Sea Air Basin (SSAB PM10)
- Imperial County portion of SSAB (Ozone and PM10)

The federal conformity determination for the Ventura County portion of the South Central Coast Air Basin (ozone) and the Southeast Desert Modified ozone area was issued by the federal agencies on June 16, 2004. The effective date for the conformity determination for the entire SCAG 2004 RTP, including all of the air basins is June 7, 2004.

On October 2, 2006, the federal agencies approved funding and determined conformity of the 2006 RTIP. The federal funding approval of the 2006 RTIP will expire on October 2, 2008. The 2006 RTIP is based on the 2004 RTP and implements the projects and programs included in the fiscal years (2006/07 - 2011/2012) of the 2004 RTP.

On May 12, 2005 a federal conformity determination was issued for the 2004 RTP and RTIP for those areas designated as non attainment under the 8-hour Ozone standard.

On March 30, 2006 a federal conformity determination for the 2004 RTP was issued for the South Coast Air Basin, which is designated as non attainment for PM2.5.

Summary of the 2006 RTIP Regional Emissions Analyses

The projects in Amendment 06-06 are from the 2004 RTP, which is a conforming Plan. Amendment 06-06 does not include any new regionally significant projects beyond those currently included in the 2004 RTP, nor does it move a project from any modeling horizon year currently assumed in the 2004 RTP and 2006 RTIP. Furthermore, the design, concept and scope of the project do not differ significantly from what was described in the 2004 RTP. Allocating funds to these projects will not delay the implementation of projects in the 2004 RTP or 2006 RTIP.

The 2006 RTIP is consistent with the 2004 RTP and the regional emissions analyses for the 2006 RTIP updates the regional emissions analyses for the 2004 RTP. As such, SCAG is using the conformity analysis for the 2006 RTIP. The regional emissions analysis methodology for this amendment to the 2006 RTIP uses two sets of calculations. For pollutants with emissions budgets, the currently applicable budget is used to determine conformity. Only one pollutant in the SCAB (PM2.5) does not currently have a budget. Until the budget is established, the less than base year test is used for analysis. For all other pollutants, the budgets remain the same as described in the 2006 RTIP and 2004 RTP.

Reaffirmation of 2006 RTIP Conformity Test

SCAG reaffirms the applicable conformity findings for the 2006 RTIP, which can be found at:

http://www.scag.ca.gov/RTIP/final06/final RTIP vol2of3 Sec02 jul06.pdf

This reaffirmation covers the findings for all applicable pollutants, including regional emissions analyses, financial constraint test, timely implementation of Transportation Control Measures (TCMs), applying the use of the latest planning assumptions and the latest approved emissions model (EMFAC2002), reaffirming consistency between the adopted 2006 RTIP and the adopted 2004 RTP, and reaffirming the process for interagency consultation and public participation.

The regional emissions analysis for the amendment was performed with the SCAG Regional Transportation Model used for the 2004 RTP and 2006 RTIP and utilizes the planning, socioeconomic and model assumptions from the 2004 RTP and 2006 RTIP. A summary of the regional emissions analysis (conformity finding) is tabulated below.

Conformity Findings

SCAG has completed its analysis of the proposed changes to the 2006 RTIP. SCAG's findings for the approval of this amendment are as follows:

Overall

Statement of Fact: Inclusion of this amendment in the 2006 RTIP would not change any other policies, programs and projects which were previously approved by the federal agencies on October 2, 2006.

Finding: SCAG has determined that the 2006 RTIP Amendment 06-06 is consistent with all federal and state requirements and complies with the federal conformity regulations.

Regional Emissions Analysis – South Coast Air Basin (SCAB)

Finding: The 2006 RTIP Amendment 06-06 regional emissions for Ozone precursors (NOx, ROG/VOC) are consistent with all applicable emissions budgets for all milestone, attainment, and planning horizon years (2003 Ozone SIP)

Finding: The 2006 RTIP Amendment 06-06 regional emissions for CO are consistent with all applicable emissions budgets for all milestone, attainment, and planning horizon years (2003 CO SIP).

Finding: The 2006 RTIP Amendment 06-06 regional emissions for NO₂ are consistent with all applicable emissions budgets for all milestone, attainment, and planning horizon years (2003 NO₂ SIP).

Finding: The 2006 RTIP Amendment 06-06 regional emissions for PM10 precursors are consistent with all applicable emissions budgets for all milestone, attainment, and planning horizon years (2003 PM10 SIP).

Finding: The 2006 RTIP Amendment 06-06 regional emissions for direct PM2.5 and NOx are less than the baseline year (2002) for the 24-hour and the annual PM2.5 standards in the SCAB.

<u>Timely Implementation of TCMs</u>

Only two non attainment areas in the SCAG region currently have TCMs, the Ventura County portion of the South Central Coast Air Basin and the SCAB. In the SCAB, the list of TCMs and the Timely Implementation Report used to track implementation of TCMs is comprehensively updated with each RTIP cycle. The most recent list of TCMs can be found in the 2006 RTIP.

Finding: The 2006 RTIP Amendment 06-06 does not change timely implementation of SCAB TCM projects. Any past obstacles to timely implementation of TCMs identified in Amendment 06-06 have been overcome. All SCAB TCM projects in the federally approved conforming 2006 RTIP are given funding priority and are on schedule for implementation.

Fiscal Constraint Analysis

Finding: RTIP Amendment 06-06 includes the most recent financial plan for the 2006 RTIP. All projects listed in the 2006 RTIP (including the proposed amendment) are financially constrained for all fiscal years.

Interagency Consultation and Public Involvement Analysis

Finding: The prior regional conformity analysis leading to FHWA and FTA's approval on October 2, 2006 complied with all federal and state requirements for interagency consultation and public involvement as documented in Section V of Technical Appendix II of the 2006 RTIP. For RTIP Amendment 06-06 SCAG will undergo additional public involvement including solicitation via email for comments from the Transportation Conformity Working Group. In addition, Amendment 06-06 will be posted on SCAG's website (www.scag.ca.gov) for a 30-day public comment period.

Regional Emissions Analysis – South Coast Air Basin (SCAB)

The South Coast Air Basin (SCAB) covers the urbanized portions of Los Angeles, Orange, Riverside, and San Bernardino counties, and is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). ¹

OZONE - SUMMER (8HR)

ROG	YR 2008	YR 2010	YR 2020	YR 2030
2006 RTIP BUDGET	214.080 216.000	152.121 155.000	107.647 155.000	73.197 155.000
<u>NOx</u>	YR 2008	YR 2010	YR 2020	YR 2030

Conformity finding requirement: RTP/RTIP emissions must be equal to or less than budget

CARBON MONOXIDE (CO) - WINTER

CO	<u>YR 2010</u>	YR 2020	YR 2030
2006 RTIP	1,817.970	863.514	530.350
BUDGET	3,361.000	3,361.000	3,361.000

Conformity finding requirement: RTP/RTIP emissions must be equal to or less than budget

NITROGEN DIOXIDE (NO₂) - WINTER

<u>NO</u> ₂	YR 2010	YR 2020	YR 2030	
2006 RTIP	449.597	206.008	133.040	
BUDGET	686.000	686.000	686.000	

Conformity finding requirement: RTP/RTIP emissions must be equal to or less than budget

¹ The emissions analysis provided is based on the 2006 RTIP.



PM10 - ANNUAL AVERAGE

ROG	YR 2006	YR 2010	YR 2020	YR 2030
2006 RTIP	247.050	189.846	106.938	72.544
BUDGET	251.000	251.000	251.000	251.000
<u>NOx</u>				
2006 RTIP	537.148	418.736	193.129	125.787
BUDGET	549.000	549.000	549.000	549.000
<u>PM10</u>				
2006 RTIP	158.972	155.823	151.893	152.247
BUDGET	166.000	166.000	166.000	166.000

Conformity finding requirement: RTP/RTIP emissions must be equal to or less than budget

PM2.5 - 24-HOUR

	YR 2010	YR 2020	YR 2030	
BASE YEAR*	13.27	13.27	13.27	
PLAN	12.53	12.10	12.71	
DIFFERENCE	0.74	1.17	0.56	

Conformity finding requirement: RTP/RTIP emissions must be equal to or less than base year * Base Year = 2002

NOx - 24-HOUR

	YR 2010	YR 2020	YR 2030
BASE YEAR* PLAN	714.110 418.740	714.110 193.130	714.110 125.790
DIFFERENCE	295.370	520.098	588.320

PM2.5 - ANNUAL

	YR 2010	YR 2020	YR 2030
BASE YEAR*	4,844	4,844	4,844
PLAN	4,573	4,417	4,639
DIFFERENCE	271	427	205

Conformity finding requirement: RTP/RTIP emissions must be equal to or less than base year * Base Year = 2002

NOx - ANNUAL

	<u>YR 2010</u>	YR 2020	YR 2030
BASE YEAR* PLAN	260,650 152,839	260,650 70,492	260,650 45,912
DIFFERENCE	107,811	190,158	214,738

Conformity finding requirement: RTP/RTIP emissions must be equal to or less than base year * Base Year = 2002

Regional Emissions Analysis - Salton Sea Air Basin - Coachella Valley

OZONE - SUMMER (tons/day)

ROG	YR 2007	YR 2010	YR 2013	YR 2020	<u>2030</u>
2006 RTIP BUDGET	3.985 4.100	3.361 4.100	2.867 4.100	2.234 4.100	1.838 4.100
<u>NOx</u>					
2006 RTIP BUDGET	11.085 11.100	9.295 11.100	7.613 11.100	4.913 11.100	3.460 11.100
Conformity finding requirements	: RTP/RTIP em	issions must be	equal to or les	s than budge	t

PM10 - Annual Emissions (tons/day)

<u>PM10</u>	YR 2006	<u>2010</u>	<u>2020</u>	YR 2030	
2006 RTIP BUDGET	8.726 10.900	8.933 10.900	9.325 10.900	9.715 10.900	
Conformity finding requirement: RTP/RTIP emissions must be equal to or less than budget					